

IN THE UNITED STATES COURT OF FEDERAL CLAIMS

THE PORTLAND MINT,	)	
	)	
Plaintiff,	)	
	)	No. 20-518C
v.	)	(Judge Horn)
	)	
UNITED STATES,	)	
	)	
Defendant.	)	

**JOINT MOTION FOR A PROTECTIVE ORDER**

Pursuant to the Court's Order of January 7, 2022, and Rule 26(c) of the Rules of the United States Court of Federal Claims (RCFC), Defendant, the United States, and Plaintiff, The Portland Mint, jointly and respectfully request that the Court enter the attached proposed Protective Order which contains otherwise salutary provisions designed to facilitate the production of information from the United States to The Portland Mint, as discussed during the Status Conference on January 4, 2022.

The proposed Protective Order will help expedite the production of information from the United States by protecting against the disclosure of (1) the methods by which the United States Mint (U.S. Mint) tests samples of submissions to its Mutilated Coin Redemption Program; (2) materials containing confidential research or development information related to such testing that should not be revealed or should be revealed only in a certain manner pursuant to Rule 26(c)(1)(G) of the Rules of the Court of Federal Claims; and (3) materials related to law enforcement activity involving The Portland Mint or material otherwise considered to be law-enforcement sensitive, which ordinarily would not be available publicly because its disclosure could harm Government interests. For these reasons, the parties jointly and respectfully request the Court to enter the attached proposed Protective Order.

Respectfully submitted,

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Dated: January 24, 2022